

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF OHIO**

**In re:**

**Suzanne Bair,**

*Debtor.*

**Chapter 7**

**Case No. 1:18-bk-12585**

**Judge Beth A. Buchanan**

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**Barestone, LLC, et al.**

**Plaintiffs**

**v.**

**Suzanne Bair,**

**Defendant-Debtor.**

**ADV. PRO. NO. 1:18-ap-01062**

**NOTICE OF DEBTOR'S MOTION FOR SUMMARY JUDGMENT**

Please take NOTICE that the attached Motion for Summary Judgement has been filed by Suzanne Bair with the Bankruptcy Court.

**Your rights may be affected.** You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. If you do not have an attorney, you may wish to consult one.

If you do not want the Court to grant the Motion for Summary Judgement, then, on or before **twenty-one** days after the date of the certificate of service of the Motion, you must file with the Court explaining your position by mailing your response to:

Clerk of United States Bankruptcy Court  
Atrium Two, Suite 800  
221 East Fourth Street  
Cincinnati, Ohio 45202

OR, your attorney must file a response using the Court's ECF System.

The Court must receive your response on or before the above date. You must also send a copy of your response either (1) by the Court's ECF System or (2) through regular U.S. Mail to:

Brian R. Radden  
Buecher Haffer Meyers & Koenig Co., LPA  
105 East 4<sup>th</sup> Street, Suite 300  
Cincinnati, OH 45202

The undersigned will present to the Court a proposed order granting the Motion for Summary Judgement unless, within twenty-one (21) days after the service date set forth on the attached certificate of service, a written memorandum in opposition along with a request for a hearing is filed with the Court and served on the undersigned. Failure to file a response and accompanying memorandum on a timely basis may be cause for the Court to grant the Motion as filed without further notice. Furthermore, notice is given that, if the attached request seeks relief from the stay or acts against property of the estate, such stay will terminate with respect to the requesting party unless, within thirty (30) days of the filing of the attached request, the Court orders the stay continued in effect pending, or as a result of, a final hearing pursuant to 11 U.S.C. Section 362(e).

Respectfully submitted,

/s/ Paul T. Saba

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**Attorneys for Debtor**

## **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was served on November 30, 2018 to the following registered ECF participants, electronically through the court's ECF System and **ordinary U.S. Mail** at the addresses listed below:

Synchrony Bank  
c/o PRA Receivables  
Management, LLC  
PO Box 41021  
Norfolk, VA 23541-1021

Barestone, LLC  
105 E 4th Street  
Suite 300  
Cincinnati, OH 45202-4023

Kingston Development  
Group, LLC  
Buechner Haffer Meyers &  
Koenig Co., LPA  
105 E 4th Street  
Suite 300  
Cincinnati, OH 45202-4023

1420 Main Street LLC 1431  
Main Street  
Cincinnati OH 45202-6339

84 Lumber  
P O Box 360343  
Pittsburgh PA 15250-0001

Security Services Inc  
P O Box 551200  
Jacksonville FL 32255-1200

Allied Glass  
2036 Reading Road  
Cincinnati OH 45202-1484

Asst US Trustee (Cin)  
Office of the US Trustee  
36 East Seventh Street,  
Suite 2030  
Cincinnati, Oh 45202

Bair Build Company, LLC  
1706 John Street  
Cincinnati OH 45214-2462

Bank of America  
PO Box 982234  
El Paso TX 79998

Barestone LLC  
2372 Madison Road  
Cincinnati OH 45208

First Bank of Ohio  
175 S Washington St  
Tiffin OH 44883-2843

Barestone, LLC  
c/o Brian Hirsch Agent  
105 E 4th Street #300  
Cincinnati OH 45202-4023

Barron Peck Bennie &  
Schlemmer  
3074 Madison Road  
Cincinnati OH 45209-1723

Bethesda Hospital  
PO Box 633571  
Cincinnati OH 45263

Brian Redden  
105 E 4th Street #300  
Cincinnati OH 45202-4023

CB Real Estate  
45 Fairfield Ave #4  
Bellevue KY 41073-1149

Cavalry SPV  
500 Summit Lake Drive  
Valhalla NY 10595-1340

Chase  
PO Box 15153  
Wilmington DE 19886-5153

Chip & Diane Denning  
1507 Republic Street  
Cincinnati OH 45202-7015

Citicards  
P O Box 6500  
Sioux Falls SD 57117-6500

Credit Collection Services  
725 Canton Street  
Norwood MA 02062-2679

D & A Services  
1400 E Touhy Ave #G2  
Des Plaines IL 60018-3338

DEPE, LLC dba Pella  
9869 Montgomery Road  
Cincinnati OH 45242-6424

Dale Seif  
110 E Emmitt  
Waverly OH 45690

David Donnett  
1212 Sycamore #36  
Cincinnati OH 45202

David Kamp  
1700 4th & Vine Tower  
1 West 4th Street  
Cincinnati OH 45202

Genpact Services, LLC  
PO Box 1969  
Southgate MI 48195-0969

Home Depot  
PO Box 790328  
Saint Louis MO 63179

Internal Revenue Service  
P O Box 7346  
Philadelphia PA 19101

Josh Loewenstine  
3616 Marburg Ave  
Cincinnati OH 45208-1611

Keidel  
1150 Tennessee Ave  
Cincinnati OH 45229

Kingston Development  
Group LLC  
2372 Madison Road Unit  
WIC  
Cincinnati OH 45208

Levy & Associates  
4645 Executive Drive  
Columbus OH 43220-3601

Lloyd & McDaniel PLC  
P O Box 23200  
Louisville KY 40223

Louisville Tile  
3200 E Kemper Road  
Cincinnati OH 45241

Michael Carter  
c/o plaintiff with  
Barestone  
5580 Windridge View  
Cincinnati OH 45243

Office of District Counsel  
312 Elm Street Suite 2350  
Cincinnati OH 45202

Ohio Attorney General 30 E  
Broad Street  
14th Floor  
Columbus OH 43215

Ohio Bureau of Workers  
Compensation  
Attn: Law Section Bankruptcy  
Unit  
PO Box 15567  
Columbus OH 43215-0567

One Advantage  
1232 W State Rd 2  
La Porte IN 46350-5469

PNC Bank  
Western Loan Center  
2730 Liberty Ave Bankruptcy  
Dept Pittsburgh PA 15222-  
4704

PRA Receivables Management,  
LLC PO Box 41021  
Norfolk, VA 23541-1021

Ravdeep & Sonia Chanana  
234 E 23rd Street #4A New  
York NY 10010-4624

Richard Avis  
PO Box 31579  
Chicago IL 60631-0579

Santina Vanzant  
8534 E Kemper Road  
Cincinnati OH 45249

Schimpf, Ginocchio &  
Kehres  
36 East 7th Street #2600  
Cincinnati OH 45202-4452

Speedway Super America  
LLC  
P O Box 740587  
Cincinnati OH 45274-0587

State of Ohio  
Department of Taxation  
Attn: Bankruptcy Division  
P O Box 530  
Columbus OH 43266-0030

Sunbelt Rental  
4631 Spring Grove  
Cincinnati OH 45232

Synchrony Bank  
PO Box 965004  
Orlando FL 32896-5004

Synchrony Bank (Lowes)  
Attention Bankruptcy Dept  
PO Box 965060  
Orlando FL 32896-5060

U S Attorney  
221 East Fourth Street,  
Suite 400  
Cincinnati OH 45202

Union Savings Bank  
8534 E. Kemper Road  
Cincinnati OH 45249-3701

Valley Insulation  
5537 OH 128  
Cleveland OH 45002

Wells Fargo  
PO Box 29482  
Phoenix AZ 85038-9482

Eileen K Field  
3991 Hamilton Middletown  
Road, Unit U  
Hamilton, OH 45011

David Weber  
300 Pike Street #500  
Cincinnati OH 45202-4241

Fifth Third Bank  
38 Fountain Square Plaza  
Cincinnati OH 45202

/s/ Paul T. Saba  
Paul T. Saba, Esq. (0063723)